

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

M.J.J.,

Plaintiff,

v.

POLK COUNTY SHERIFF'S DEPARTMENT,
DARRYL L. CHRISTENSEN,

Case No. 15-cv-433

Defendants

and

WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION,

Intervenor.

AFFIDAVIT OF LORI M. LUBINSKY

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

LORI M. LUBINSKY, being first duly sworn, on oath deposes states as follows:

1. I am an adult resident of the State of Wisconsin.
2. I am one of the attorneys representing Intervenor, Wisconsin County Mutual Insurance Corporation, in the above-captioned matter.
3. I make this Affidavit on the basis of my personal knowledge of the facts set forth herein.
4. I make this Affidavit in support of Intervenor's Motion for Summary Judgment.
5. While ordinarily the Court requires transcripts of depositions to be uploaded to Pacer, because the Plaintiff in this action is proceeding using a pseudonym and deposition transcripts must be redacted to protect her identify, attached to this Affidavit are the redacted

pages of relevant deposition transcripts. Submitting the entire transcripts to the Court would require extensive redaction.

6. Attached hereto as Exhibit 1 is a true and correct copy of pages 46, 53-54, 67, 83-84, 87-91 and 108 of the deposition transcript of M.J.J. taken on April 5, 2016, with redactions for any identifying information involving the Plaintiff or the Plaintiff in the companion case.

7. Attached hereto as Exhibit 2 is a true and correct copy of pages 6, 8, 12, 16, 17-18, 29, 32-34, 37-38, 41-43, 55-59, 73-74 of the deposition transcript of Darryl L. Christensen taken on May 18, 2016, with redactions for any identifying information involving the Plaintiff or the Plaintiff in the companion case.

8. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit 1 from Darryl Christensen's deposition.

9. Attached hereto as Exhibit 4 is a true and correct copy of Exhibit 2 from Darryl Christensen's deposition.

10. Attached hereto as Exhibit 5 is a true and correct copy of Exhibit 11 from Darryl Christensen's deposition.

11. Attached hereto as Exhibit 6 is a true and correct copy of Exhibit 12 from Darryl Christensen's deposition, with redactions for any identifying information involving the Plaintiff or the Plaintiff in the companion case.

Dated this 10th day of June, 2016.

s/ Lori M. Lubinsky
Lori M. Lubinsky

Subscribed and sworn to before
me this 10th day of June, 2016.

s/ Ellen G. Teed
Notary Public, State of Wisconsin
My commission expires: 12/1/17
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